

## The Marlborough Law Firm, P.C.

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November 19, 2018

Sent via ECF

The Honorable Magistrate Judge Michael A. Hammer  
United States District Court District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

Re: *Espinal, et al. v. Pogoriler, et al.*  
Docket No.: 2:18-cv-00738-KM-MAH

Dear Judge Hammer:

This office represents Plaintiffs in the above-referenced matter. I submit this joint status letter on behalf of all parties who have appeared in this action, including Defendant Leonid Pogoriler and the companies that he operates (the “Pogoriler Defendants”) in response to the Court’s Order dated November 12, 2018. (ECF No. 66).

On October 22, 2018, Judge McNulty issued a Decision and Order denying Plaintiffs’ motion for approval of the FLSA settlement between them and the Pogoriler Defendants. (ECF No. 64). While the Pogoriler Defendants had been dismissed without prejudice from the litigation, as a result of the Court’s decision, Plaintiffs intend to bring the Pogoriler Defendants back into the case.

The parties have agreed that Plaintiffs will file an amendment to the Complaint on or before December 4, 2018.

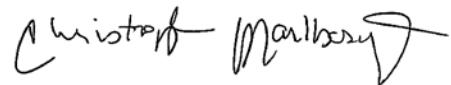
The parties have further agreed that each of the named Defendants will file their response to the Complaint on or before January 9, 2019.

The parties seek to explore a resolution to the action prior to any additional motion practice or discovery. Therefore, the parties request that the Court schedule a settlement conference before Your Honor at the Court’s convenience.

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The parties jointly thank the Court in advance for its consideration of this request.

Respectfully submitted,



Christopher Marlborough